

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE	:	CHAPTER 13
	:	
MARYANN MENKHAUS	:	
	:	
Debtor(s)	:	No. 19-17048 amc

**DEBTOR'S RESPONSE TO THE MOTION OF BRIDGECREST CREDIT COMPANY,
LLC FOR RELIEF FROM THE AUTOMATIC STAY**

COMES NOW, MARYANN MENKHAUS, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-5. DENIED. The averments contained in these Paragraphs consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

6-9. DENIED. Debtor acknowledges she fell behind with post-petition payments to the Movant due to a loss of income resulting from the current pandemic. However, Debtor believes she has made payments that have not been properly credited. She is presently gathering receipts and will forward to Counsel.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied, and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

November 22, 2021

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato

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